

TIFFANY & BOSCO, P.A.

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TB File No. 19-71022

Attorneys for *Secured Creditor* Fay Servicing, LLC

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

IN RE:

RICKY J. MONTOYA FDBA
LAZYDAYZ OUTDOOR KITCHENS
AND HOLLY A PEARCY-MONTOYA,

Debtors.

BK Case No. 19-10566-mkn

Chapter 13

**LIMITED RESPONSE TO MOTION
TO SELL REAL PROPERTY
LOCATED AT: 4108 DOVE CREEK
ROAD, NORTH LAS VEGAS, NV
89032**

LIMITED RESPONSE TO MOTION TO SELL REAL PROPERTY

Fay Servicing, LLC, Secured Creditor in the above-entitled Bankruptcy proceeding, hereby submits the following the following limited response to the Debtors' Motion to Sell Real Property located at **4108 Dove Creek Road, North Las Vegas, NV 89032**.

Secured Creditor, as first lien holder or agent for the same, does not oppose the sale of the real property provided Secured Creditor's lien will be paid in full subject to the sale closing on within 90 days from the date of the Court's Order and sale is subject to a proper payoff quote; or that any extension of the closing date or sale short of full payoff be subject to Secured Creditor's final approval. Further, funds from the sale should be received by

1 Secured Creditor within ninety (90) days from the date of the Court's order, unless otherwise
2 agreed to by Secured Creditor.

3 DATED this 30th day of September, 2019.

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5 **TIFFANY & BOSCO, P.A.**

6 By /s/ Ace C. Van Patten, Esq.
7 ACE C. VAN PATTEN, ESQ.
8 Attorney for Secured Creditor
9 10100 W. Charleston Boulevard, Suite 220
10 Las Vegas, NV 89135
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CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

1. On this 30th day of September, 2019, I served the following documents:

LIMITED RESPONSE TO MOTION TO SELL REAL PROPERTY

2. I caused to be served the above-named document by the following means to the persons as listed below:

X a. ECF System

Narrah F Newark
bk@nnbklaw.com
Attorney for Debtors

Rick A. Yarnall
ecfmail@lasvegas13.com
Trustee

1 **X b. United States mail, postage fully prepaid:**

2 Narrah F. Newark
3 608 S. 8th Street
4 Las Vegas, NV 89101
5 Attorney for Debtors

6 Ricky J. Montoya and Holly A Percy-Montoya
7 4108 Dove Creek Rd
8 North Las Vegas, NV 89032
9 Debtors

10 **I declare under penalty of perjury the foregoing is true and correct.**

11 DATED this 30th day of September, 2019.

12 By: /s/ Michelle Benson
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